

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

JAN 23 2018

DON NEWBERRY, Court Clerk
STATE OF OKLA; TULSA COUNTY

NIKOLE R. COLLINS,

Plaintiff,

v.

PEPSICO;
BOTTLING GROUP, LLC

Defendant.

Case No.

CJ-2018-00310

ATTORNEY LIEB CLAIMED
JURY TRIAL REQUESTED

REBECCA NIGHTINGALE

PETITION

COMES NOW, Plaintiff Nikole R. Collins, by and through her attorney of record, J. Derek Ingle of E. Terrill Corley & Associates, and files this Petition against the Defendants PepsiCo and/or Bottling Group, LLC, and alleges as follows:

I. PARTIES, JURISDICTION AND VENUE

1. Plaintiff is an individual residing in Tulsa, Tulsa County, Oklahoma.
2. Defendants are corporations doing business in the State of Oklahoma, County of Tulsa.
3. Defendant is an employer and Plaintiff was an employee within the meaning of Oklahoma law.
4. The events giving rise to this action occurred in Tulsa County, Oklahoma.
5. The jurisdiction and venue of this Court is proper.
6. Plaintiff filed a claim with the EEOC and received her Notice of Right to Sue on or about October 30, 2017. This suit is being filed within ninety (90) days of receiving the Right to Sue Notice.

Ex.A

II. FACTS

7. Plaintiff began her employment with Defendant in December of 2005 and was terminated on or about March 28, 2017.

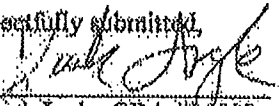
8. During her employment, Plaintiff was subjected to gender discrimination, hostile work environment and harassment. Among many examples, Plaintiff was discouraged from becoming pregnant or having a family while employed at Defendant. Plaintiff was also terminated for her gender and pregnancy.

9. Defendant also subjected Plaintiff to emotional distress.

10. As a result of the illegal acts of the Defendant, Plaintiff is entitled to back pay for all lost wages and benefits, front pay in lieu of reinstatement, compensatory damages, punitive damages, prejudgment and post-judgment interest and any other damages, losses and costs appropriate under Oklahoma law.

WHEREFORE, Plaintiff prays for damages in excess of \$75,000.00 and any other relief that this Court deems just and proper.

Respectfully submitted,


J. Derek Ingle, OBA #16509
E. TERRELL CORLEY & ASSOCIATES
1809 E. 15th Street
Tulsa, OK 74104-4610
(918) 744-6641 - telephone
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Case No. CJ-2018-00310

Judge Rebecca Nightengale

SUMMONS

TO THE FOLLOWING NAMED DEFENDANT: Pepsico Bottling Group, LLC
510 W. Skelly Drive
Tulsa, OK 74107
or anywhere else they may be found

You have been sued by the above named Plaintiff, and you are directed to file a written answer to the attached petition in the court at the above address within twenty (20) days after service of this summons upon you, exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff. Unless you answer the petition within the time stated, judgment will be rendered against you with costs of the action.

If Interrogatories and Request for Production of Documents are served with this Petition, you are directed to answer the Interrogatories and produce the documents requested within forty-five (45) days after service of these Interrogatories and Request for Production of Documents.

Issued this 25 day of 4, 2018.

Attorney for Plaintiff:
J. Derek Ingle, OBA # 16509
Boettcher, DeVinney, Ingle & Wicker
2202 E. 49th Street, Suite 600
Tulsa, OK 74105
(918) 728-6500 - Telephone
(539) 664-4129

TULSA COUNTY DISTRICT COURT CLERK

BY: 

DEPUTY COURT CLERK

Authorized to Serve: _____

PSL #: _____

Authorized By: _____

This Summons was mailed/served by certified mail, restricted delivery & return receipt requested on the
day of _____, 2018.

(Signature of person serving summons)

You must file an Answer within twenty (20) days of the date of service of this Summons.

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH
ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE
SUMMONS.